

1 great value to the publishers, and it is -- they can
2 buy our service, or they can -- you can get it from
3 another spot, but if you can buy the service at what
4 we feel like is a fair price and then put it into the
5 form of directory, we feel like that is worthwhile,
6 and we feel like we have offered a very low and fair
7 price.

8 **COMMISSIONER CLARK:** We may be talking past
9 each other, because when I think of reasonable
10 contribution -- which you have said to you means
11 reasonable profit -- I think in terms of a regulated
12 profit, and it tends not to be 13,000%.

13 **WITNESS JUNEAU:** 1,300. I understand.

14 **COMMISSIONER CLARK:** 1,300. It tends not to
15 be that high.

16 **WITNESS JUNEAU:** Yes, ma'am.

17 **COMMISSIONER CLARK:** So it sounds to me like
18 what you intend to charge is what you think the value
19 of the service is in terms of what the market will
20 bear.

21 **WITNESS JUNEAU:** That has been -- whether
22 the market will bear or not is -- it seems as though
23 in other areas the market bears a considerably higher
24 price than we charge. We're completely out of line
25 with any other LEC or RBOC that provides a service.

1 COMMISSIONER CLARK: Let me ask one other
2 thing. Why is it appropriate to charge market prices
3 for this service as opposed to cost plus a
4 contribution of, say, 12%?

5 WITNESS JUNEAU: In this instance the
6 listing information has great value, Commissioner. It
7 allows the directory publisher to have the
8 information, the basic information, to go forth with a
9 directory that will contain, like I said, thousands,
10 hundreds of thousands, millions of dollars of
11 advertising. It is very valuable information.

12 COMMISSIONER CLARK: What is BellSouth's
13 relationship to BAPCO? Is it a sister company?

14 WITNESS JUNEAU: BAPCO is a subsidiary of
15 BellSouth Corporation.

16 CHAIRMAN JOHNSON: Mr. Horton, do you have
17 more questions?

18 Q (By Mr. Horton) Mr. Juneau, I'm going to
19 hand you a sheet of paper, and I've already showed
20 this to counsel. This is a page from
21 Telecommunications Act of 1996. It's Section 222-E.
22 Would you -- there's a star with a number 1 by it. Do
23 you see that?

24 A Yes.

25 Q Would you read that section, please?

1 A "Subscriber list information.
2 Notwithstanding subsections B, C and D, a
3 telecommunications carrier that provides telephone
4 exchange service shall provide subscriber list
5 information gathered in its capacity as a provider of
6 such service on a timely and unbundled basis under
7 nondiscriminatory and reasonable rates, terms and
8 conditions to any person upon request for the purpose
9 of publishing directories in any format."

10 Q And would you look over there at the
11 definition of subscriber list information that's
12 starred with a number 2 next to it. Do you see that?

13 A Yes.

14 Q And is that what we're talking about here
15 today? Go ahead and just read that definition to
16 yourself.

17 A (Witness complies.) Okay.

18 Q You've read Mr. Screven's testimony; right?

19 A Yes.

20 Q And you've heard his testimony today?

21 A Yes.

22 Q Isn't what he's asked for exactly what's
23 required by Section 222-E?

24 A I'm not sure what he's asked for. What he's
25 asked for obviously contains a list of the names,

1 address, phone numbers and primary business
2 classifications; but I'm not sure we have a request in
3 a form that we can work with that. If that is -- what
4 we provide in the central office base list is
5 precisely what is defined in Subscriber List
6 Information.

7 Q Subscriber list information is what's
8 provided to BAPCO, correct?

9 A BAPCO is provided every bit of service
10 record, service order activity, and BAPCO has to
11 decipher that information to pull this information
12 right here to be useful in their directories. We
13 don't furnish BAPCO a precise list of just that
14 selected information.

15 Q You provide BAPCO with a daily list of
16 service activities, service orders, correct?

17 A That's correct; all service order activity.

18 Q All service order activity. And that has
19 the name of the subscriber and carrier, right?

20 A It has the name of the subscriber.

21 Q And you already agreed with me earlier, the
22 telephone numbers, the address, the primary
23 advertising classification, correct?

24 A That's correct.

25 Q And that's what subscriber list information

1 is; correct?

2 A Correct.

3 Q And that's what 222-E requires you to
4 provide to directory publishers, correct?

5 A That's correct.

6 MR. HORTON: I don't have any further
7 questions. Thank you. Thank you, Mr. Juneau.

8 CHAIRMAN JOHNSON: Staff.

9 CROSS EXAMINATION

10 BY MR. PELLEGRINI:

11 Q Good afternoon, Mr. Juneau. I'm Charlie
12 Pellegrini on behalf of Commission Staff.

13 A Good afternoon.

14 Q Mr. Juneau, do you have the exhibit marked 3
15 at hand; exhibit marked 3 for identification? Do you
16 have that at hand, containing Mr. Screven's responses
17 to Staff interrogatories?

18 A No. I believe I have three, MLJ-1, 2 and 3.
19 This is another one of your documents that I'm looking
20 for?

21 Q Well, it would be identified as GS-2
22 otherwise.

23 A No, I do not have that.

24 Q Let me turn your attention to
25 Interrogatory No. 28. That's going to be on Page 22,

1 handwritten.

2 A Right.

3 Q Do you have that?

4 A I have that.

5 Q Are you familiar with the response, FIDP's
6 response as stated there?

7 A I am.

8 Q Would you take a moment to review it,
9 please?

10 A Okay. (Pause) Okay.

11 Q Let me ask you this: Has FIDP or
12 Mr. Screven ever formally requested that BellSouth
13 provide an update service consistent with that
14 statement, that is the statement in Mr. Screven's
15 response to Staff's Interrogatory 28a?

16 A I can't tell you if this specific request
17 has come to us from Mr. Screven. We do have a request
18 from Mr. Screven for new connect activity, but in this
19 form I don't know that we've received one that looks
20 like it.

21 Q Does Mr. Screven's request for a new correct
22 activity differ in some way from the statement to
23 which I've referred you?

24 A The new connect activity isolated from other
25 changes would, to my way of thinking, be different

1 that this. That's a very select list of items.

2 Q Well, has anyone made a request to BellSouth
3 that would be consistent with FIDP's response at 28a?

4 A I'm not aware of a request that looks like
5 this that would fit this criteria.

6 Q Would you necessarily know if such request
7 had been made?

8 A I would not necessarily know of every
9 request; no, I wouldn't, but -- no.

10 Q Can you investigate this question and
11 prepare a late-filed exhibit that would indicate
12 whether or not such request had been received by
13 BellSouth?

14 A I will.

15 COMMISSIONER CLARK: Mr. Pellegrini, were
16 you also going to ask them to price out, or if they
17 provided such a service what the cost would be?

18 MR. PELLEGRINI: Yes.

19 CHAIRMAN JOHNSON: Could you give me a name
20 for that late-filed?

21 MR. PELLEGRINI: Request for Service
22 Consistent with FIDP Response to Staff
23 Interrogatory 28a. It's not very brief, but it's the
24 best I can do.

25 CHAIRMAN JOHNSON: Okay. And you understand

1 the request?

2 WITNESS JUNEAU: Yes, I do.

3 COMMISSIONER CLARK: Madam Chairman, I want
4 to be sure that -- it seems to me that what the Staff
5 has asked for -- and I want to be clear this is what
6 they want, or if that's not what they want, I'd like
7 to ask for it -- that you will let us know whether
8 anyone has requested any of this service under this
9 response.

10 WITNESS JUNEAU: That's correct.

11 COMMISSIONER CLARK: And you will also
12 respond to how much it would cost to provide the
13 service and what your proposed rate would be for the
14 service.

15 WITNESS JUNEAU: We'll provide that,
16 Commissioner.

17 MR. PELLEGRINI: And one more thing, I would
18 like that to include whether or not BellSouth made a
19 market demand analysis, and if so, what that analysis
20 indicates, or indicated.

21 WITNESS JUNEAU: Okay. We'll include that.

22 MR. PELLEGRINI: Commissioner Clark, is that
23 consistent with what --

24 COMMISSIONER CLARK: Yes. I think that's
25 good. The only other thing I was thinking of is an

1 indication of whether you provide this service to
2 BAPCO and what you charge BAPCO for that service. Can
3 you do that, too?

4 WITNESS JUNEAU: I'm sorry. You're asking
5 if we provide this service to BAPCO?

6 COMMISSIONER CLARK: Yes.

7 WITNESS JUNEAU: We do not provide it in
8 this form, and BAPCO gets their information in one
9 form, and that is the daily fee of all service order
10 activity to put it into the format that is described
11 here. BAPCO does that for themselves, which is the
12 real difference in what the publishers are asking.

13 They're asking us to expend the effort, do
14 the programming and the work to put it in the fashion
15 that they can use it. And so that is a significant
16 difference in the request, and I'm not sure I
17 understand what I'm being asked to provide.

18 COMMISSIONER CLARK: I see your point, that
19 they get raw data and they --

20 WITNESS JUNEAU: They get raw data. This is
21 a long-standing arrangement that's evolved over time
22 because BAPCO has been our agent for this time period,
23 and so they have purchased the computer equipment and
24 done the programming such that they can just read the
25 service order activity to determine their own needs.

1 We don't -- we don't act on that data whatsoever,
2 other than to feed it from the service order system
3 directly to BAPCO.

4 COMMISSIONER GARCIA: What do you charge
5 them for feeding that information?

6 WITNESS JUNEAU: I do not know the cost
7 structure for BAPCO, Commissioner.

8 (Pause)

9 COMMISSIONER CLARK: While they're
10 consulting, I guess then let me go back to a question
11 I asked previously; and that was, what do you charge
12 BAPCO for this same information, and that being
13 providing all the directory information. And you said
14 you charge more than you're charging --

15 WITNESS JUNEAU: Well, you're correct. I
16 don't know the structure. I do know the effect of
17 that charge is that BAPCO pays a higher rate than the
18 tariffed rate, but I don't know the structure of the
19 charge. I don't mean to be in conflict, but I hope
20 that's not in conflict.

21 COMMISSIONER CLARK: You're saying that on a
22 per listing basis that BAPCO winds up paying more than
23 four cents?

24 WITNESS JUNEAU: That's correct.

25 COMMISSIONER GARCIA: I don't see how that's

1 possible. I mean, you're saying that there's a
2 constant back and forth and they're hooked up directly
3 and there's a long-standing relationship. First of
4 all, I question how you even keep an accounting of
5 that.

6 WITNESS JUNEAU: We don't -- I don't know.

7 COMMISSIONER GARCIA: I would understand
8 maybe you had a flat rate for them, and then you're
9 guessing that if you broke it down -- I mean, on the
10 bulk rate it probably is more than the independent
11 operators pay, but if you broke it down into line by
12 line, you're telling me that they pay more per --

13 WITNESS JUNEAU: Per listing.

14 COMMISSIONER GARCIA: -- per listing than
15 the independents, than your tariffed rate?

16 WITNESS JUNEAU: My understanding is that
17 BAPCO's charge would equate to a greater amount than
18 the tariffed rate to the directory providers based on
19 the current arrangements.

20 Q (By Mr. Pellegrini) Mr. Juneau, with
21 respect specifically to isolated new connect listings,
22 you've indicated that this is a complex -- that it
23 would entail a complex process to provide such a list?

24 A Yes.

25 Q Can you explain what that complexity is?

1 Why is it nothing more than sorting on the basis of
2 date?

3 A Sorting on the basis of dates? I couldn't
4 describe the programming activity that would be
5 involved. I'm just saying that it would be involving
6 defining precisely what is desired so that we could
7 give a programmer the specifications to do exactly
8 what the directory publishers would want.

9 Q Has BellSouth done a cost study that would
10 support your characterization that it's a complex
11 process?

12 A Not for the new connect activity on an
13 isolated basis.

14 Q In a general sense, Mr. Juneau, describe the
15 process, if you will, that BellSouth goes through to
16 determine whether a service should be tariffed.

17 A We've become aware of the nature of the
18 request, do an analysis of the request, see what the
19 demand would be, prepare a cost study, and then
20 propose a rate to go with that cost, and file the
21 tariff with the terms and conditions.

22 Q Would FIDP's request for residential and
23 business new connect information be the kind of thing
24 that would initiate that kind of analysis or study?

25 A It would, Mr. Pellegrini, in the sense that

1 that is the type of a request -- again, this is kind
2 of the first time that we've heard this request is of
3 the filing of this one for strict information that's
4 strictly new connects; and having worked with the
5 publishers on other areas, we have not gained a
6 response on what we had proposed. There was not a
7 willingness to purchase the product.

8 Q You're saying that this is the first time --

9 A For a listing of new connects. As of this
10 proceeding, the filings in this proceeding, this is
11 the first time we've been aware of an isolated listing
12 of new connect activity as a requested item.

13 Q Are you saying that that requirement is
14 not -- that Mr. Screven has not described that
15 requirement in any of his testimony?

16 A No.

17 Q Either today or prior to today?

18 A No, I think that this is when we've become
19 aware of this request is through this proceeding at
20 this point in time. Requests for new connect activity
21 has been discussed in the past, but it has not been
22 isolated to a request for only new connect activity.

23 Q If, as it turned out, there was an
24 inadequate market demand for a service such as new
25 connect listings, would BellSouth be prepared to offer

1 that, such a service, on the basis of a contracted
2 service?

3 A We would look at that certainly. A contract
4 service arrangement?

5 Q Yes.

6 A That would be a very viable alternative.

7 Q Something like that has not to this point
8 been considered?

9 A Not that I'm aware of.

10 Q In the course of this proceeding, which has
11 gone on for some time, why has BellSouth not offered a
12 special services contract arrangement for this
13 service?

14 A I'm not aware why that has not come up,
15 other than this one is fairly recent. I mean, this
16 specific instance of the new connects only, that is a
17 recent item, and I'm not sure that we've had
18 negotiations on that one at all.

19 Q And to your knowledge, BellSouth has not
20 offered a special contract service arrangement for a
21 new connect listing of any kind?

22 A That's correct. To the best of my
23 knowledge, we've not offered a contract service
24 arrangement.

25 Q And you've not received a request for a new

1 connect listing from anyone other than FIDP?

2 A That is the only one that I'm aware of.

3 Q Or other than Mr. Screven?

4 A That's correct. That's the only one that
5 I'm aware of.

6 Q Just to be absolutely certain, you've not
7 received a request for this service from any other
8 independent directory publisher?

9 A For a listing of isolated and only new
10 connects, I'm not aware of any other request other
11 than Mr. Screven's.

12 Q Have you some idea of what demand would be
13 sufficient in order for BellSouth to provide this kind
14 of service?

15 A I really don't know what it would take to
16 provide that. I'm not sure what the level of demand
17 would be.

18 Q Are you familiar with the considerations
19 that would have to be made to establish the necessary
20 demand level?

21 A No, I'm not, not for this product. I would
22 not know.

23 Q (Pause)

24 COMMISSIONER CLARK: While they're talking,
25 let me ask you something about -- you also have a

1 tariff to provide information for people to provide
2 directory assistance; is that correct?

3 WITNESS JUNEAU: That's correct.

4 COMMISSIONER CLARK: What is the rate per
5 listing as compared to the rate -- the four cents
6 rate?

7 WITNESS JUNEAU: The rate per listing for
8 directory assistance is three and a half cents per use
9 of that listing; essentially three and a half cents
10 each time a directory assistance listing is requested.

11 COMMISSIONER CLARK: Because I was trying to
12 understand why it was important for you to have the
13 limitation on the use of the information and it be --
14 they be your concern that it's going to be used for
15 directory assistance.

16 WITNESS JUNEAU: Right.

17 COMMISSIONER CLARK: And that's the reason,
18 is because it would affect your revenues from your
19 directory assistance rates?

20 WITNESS JUNEAU: There are two different
21 services; and I wouldn't characterize it just because
22 it would affect our revenues. They are two different
23 services, and directory assistance is a service that
24 has greater value. It has greater value to the end
25 user. It's not just greater value to BellSouth.

1 **COMMISSIONER CLARK:** Which one has greater
2 value?

3 **WITNESS JUNEAU:** Directory assistance does.
4 Directory assistance is valuable to an end user who
5 has no other means of directory information, who
6 doesn't have a directory, has an outdated directory.
7 With the telephone they can call directory assistance
8 and still find the information they need.

9 So it does provide value to the customer,
10 and therefore it has value to BellSouth, and it has
11 value to any other provider of directory assistance.

12 **COMMISSIONER CLARK:** I guess what I'm trying
13 to understand is why is it appropriate for you to put
14 a limitation on the uses to which information obtained
15 under this tariff can be used, can be put; what uses?
16 Why is it appropriate?

17 **WITNESS JUNEAU:** I think this goes to the
18 definition, Commissioner, of what is the difference in
19 directory publisher service and directory assistance
20 service; and our position has been that they are two
21 different and distinct services that have a different
22 purpose and a different value.

23 **COMMISSIONER CLARK:** The same information
24 has different market value depending on how you use
25 it; is that what you're saying?

1 WITNESS JUNEAU: It has value to the
2 consumer differently, too, and rather than just focus
3 on the market value to BellSouth, that market value is
4 based on the value to the consumer. Directory
5 assistance in the traditional sense has greater value.
6 Directory assistance over the Internet has the greater
7 value.

8 COMMISSIONER CLARK: What you're saying is
9 the price you charge, you want it to be based on the
10 market value of that product, which would depend on
11 the uses to which it's put?

12 WITNESS JUNEAU: The use is based, though,
13 on the value to the consumer, but it is a market
14 price.

15 COMMISSIONER CLARK: Let me be more direct.
16 Why is it appropriate to have one tariff that provides
17 this information with no limitation on how the people
18 buying it can use it?

19 WITNESS JUNEAU: If it's the decision that
20 there is no difference in directory assistance and
21 directory publishing, then that would be a correct
22 statement, other than to my way of thinking in the
23 limitation of the use of the service for telemarketing
24 would not be appropriate because that would violate
25 privacy, but under your assumption there that there

1 would be no difference if you define the services to
2 be the same, we have not.

3 COMMISSIONER CLARK: Thank you.

4 Q (By Mr. Pellegrini) Mr. Juneau, the
5 tariffed rates from the monthly refresh files are in
6 all cases four times the per listing price for the
7 central office file; is that correct?

8 A Right.

9 Q Can you rationalize that factor of 4?

10 A Other than there is additional value in
11 having the -- having a current update service. That
12 is the rationale; it is a more valuable service. And
13 selection of 4, I can't speak to, other than any other
14 number that was picked as a multiplier.

15 Q Is there any underlying data that would
16 support that factor?

17 A Not that I'm aware of.

18 Q Mr. Juneau, was an update service first
19 discussed in the regional negotiations between
20 BellSouth and DPDS customers in the 1994-1995 matter
21 in Louisiana?

22 A I'm not sure if that's the first time.

23 Q No. I didn't mean to ask you if it was the
24 first time, but was it -- well, yes.

25 A Would you repeat your question? I must have

1 misunderstood it.

2 Q I asked you whether an update service was
3 first discussed in the regional negotiations between
4 BellSouth and DPDS in Louisiana. I may have cut off
5 your answer, and I'm sorry if I did.

6 A I don't know if that is -- if that was the
7 first point that was discussed or if it had been
8 discussed at some other. I'm not aware of
9 negotiations prior to the Louisiana negotiations.

10 Q But it was discussed in those --

11 A The refresh.

12 Q -- negotiations?

13 A Yes.

14 Q The monthly refresh?

15 A My understanding is the monthly refresh was
16 discussed in the Louisiana negotiations.

17 Q And did the Louisiana negotiations lead to
18 the update service as tariffed in the Louisiana --

19 A That is my understanding is that was the
20 product of those negotiations, was the update service.
21 The tariff in Florida reflected the Louisiana tariff
22 precisely on that.

23 Q In this proceeding, in your view, has FIDP
24 identified wanting something different than what is
25 currently tariffed?

1 A I understand that FIDP wants something
2 different than what is currently tariffed. I'm not
3 sure I understand exactly what that is at this point.

4 Q Just a few more questions, Mr. Juneau. When
5 BellSouth first tariffed its DPDS was a printed
6 booklet form the only allowable format for publishing
7 directories?

8 A Yes.

9 Q And currently the tariff permits directories
10 to be published in printed booklet or CD ROM format;
11 is that correct?

12 A That's correct.

13 Q Are there any other forms of directories
14 that BellSouth believes are acceptable ways to publish
15 directories under the current DPDS tariff?

16 A In the data request BellSouth specified that
17 a diskette would be equivalent to a CD ROM for the
18 definition of electronic or --

19 Q How about publication on the Internet?

20 A We would disagree with that one. BellSouth
21 sees that publication on the Internet would be a
22 directory assistance service. It is a look-up
23 service. It's a place where an individual would go
24 for a specific listing in lieu of using a directory of
25 either paper or CD ROM. It's ubiquitous at this

1 point. You can get literally any listing you want
2 in -- by looking up name, address, whatever.

3 There are a couple of sites on the Internet
4 today that do this, and they are look-up services. It
5 is precisely -- in our definition it's precisely an
6 alternative to directory assistance.

7 Q How is that different, really, from a
8 customer who is looking for a certain number, how is
9 it different -- if he were to access the Internet for
10 that information, how is that different than if he
11 were to access a printed directory for this
12 information?

13 A It would be different if he did not have a
14 printed directory in his possession.

15 Q Well, but suppose he did have a printed
16 directory in his possession.

17 A Then he potentially would get the same
18 information if the directory was up to date.

19 CHAIRMAN JOHNSON: So how is it different?

20 WITNESS JUNEAU: I'm sorry?

21 CHAIRMAN JOHNSON: How is it different?

22 WITNESS JUNEAU: How is it different?

23 CHAIRMAN JOHNSON: Yes.

24 WITNESS JUNEAU: It's different as in, I
25 think, the value that is available in directory

1 assistance in the traditional sense. People will call
2 directory assistance for a couple of reasons; one,
3 they do not have a directory, or they -- the directory
4 they have does not have the listing that they're
5 seeking, perhaps a new resident, or just don't want to
6 go get it.

7 You know, they might just choose that it's
8 easier to go ahead and call directory assistance and
9 get the information; and I think the same thing is
10 true in electronic format. CD ROM placed in a
11 computer would be roughly the equivalent of a paper
12 telephone directory, which you could look up your own
13 listing if -- however, if you can't find the CD, it's
14 scratched, for some reason it doesn't work, and you
15 can still get into your computer, you can go in and
16 look up the Internet service. It's there whenever you
17 want it and whether or not you have a directory at
18 your disposal. To me, that's the difference.

19 **CHAIRMAN JOHNSON:** Say that again. The
20 difference is if you have -- between the CD ROM and
21 the print directory, having the Internet access, how
22 is -- I guess you were saying it was more like
23 directory assistance.

24 **WITNESS JUNEAU:** It's a look-up service.
25 You know, it's similar to directory assistance. You

1 call directory assistance for a specific listing for
2 whatever reason that you don't have it by way of a
3 directory. Whether you choose to use it or do not
4 have a directory it's an alternative that provides you
5 the number in the absence of that directory.

6 The Internet is essentially the same thing.
7 It's just not tended by an individual. You just do
8 your own search, but it's a look-up that you can
9 configure yourself without the benefit of the
10 directory. And in the absence of any directory in
11 hand, any paper directory, any CD ROM, any other type
12 of directory, you can go into the Internet and look up
13 a directory listing. It's identical, in our opinion,
14 to directory assistance that BellSouth provides.

15 COMMISSIONER CLARK: It sounds to me like
16 what you're saying is the difference is it's in a
17 remote location and you have to go outside your living
18 room where you might have your phone book or your
19 computer, and you have to go seek the information from
20 an off-premises source.

21 WITNESS JUNEAU: Well, Commissioner, that,
22 in one regard that's true. It's an alternative to
23 using a physical directory.

24 COMMISSIONER CLARK: So is a CD ROM.

25 WITNESS JUNEAU: And a CD ROM is an

1 alternative to the paper directory, but it basically
2 provides you the same thing. It's a complete list of
3 all the directory -- all the directory listings, and
4 you can use your keyboard and your computer to look
5 just as you would flip through the pages of a paper
6 directory.

7 COMMISSIONER CLARK: Which is the same thing
8 you would do on the Internet.

9 WITNESS JUNEAU: But there is -- to me, the
10 difference there is that in the absence of any
11 directory, you can still go into the Internet. If you
12 have no CD ROM directory and you have no paper
13 directory but you do have your computer linked to the
14 Internet, you have directory assistance service. You
15 can look up an individual listing right there without
16 the benefit of any directory being available.

17 CHAIRMAN JOHNSON: Okay. That's
18 interesting, because in the absence of the computer --
19 I'm having a problem with that logic. In the absence
20 of the printed directory, certainly you can't look up
21 the numbers if that's the only source you have, but in
22 the absence of having Internet, you can't look it up
23 either.

24 The distinction that Commissioner Clark made
25 was the only distinction that I could follow